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9 *Attorney for Dora Plaintiffs*

10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**  
12 **SAN DIEGO DIVISION**

13 Ms. L, et al.,

14 Plaintiff,

15 v.

16 U.S. Immigration and Customs  
17 Enforcement, et al.,

18 Defendant.

Case No. 3:18-cv-428-DMS

Honorable Dana M. Sabraw

**JOINT MOTION SEEKING  
COURT APPROVAL OF  
PARTIES' STIPULATION  
RELATED TO COSTS OF  
MAILED NOTICE**

19 Pursuant to Local Rule 7.2, the parties, through counsel of record, hereby file  
20 a Joint Motion respectfully requesting the Court to enter an order approving the  
21 parties' agreed-upon stipulation related to costs of mailed notice for the class action  
22 settlement approved by the Court on November 15, 2018. The parties stipulate and  
23 agree as follows:

24 **RECITALS**

25 WHEREAS, Defendants agree to pay for costs to provide notice to non-  
26 detained class members for an amount up to \$16,500.00.

27 WHEREAS, Plaintiffs will provide Defendants with a detailed accounting of  
28

1 all costs. If Defendants believe that Plaintiffs are improvidently using the money  
2 provided by Defendants, Defendants reserve the right to raise such concerns and any  
3 related disputes to the Court for resolution.

4 WHEREAS, if Plaintiffs determine that they need more than \$16,500.00 to  
5 provide notice to non-detained class members, Plaintiffs will notify Defendants and  
6 will provide a detailed estimate of the additional amount requested, and the parties  
7 will meet and confer regarding the request and, if the parties reach agreement, present  
8 to the Court a joint proposed order to authorize the payment of further notice-related  
9 costs. Should the parties fail to resolve the matter, the parties will present the dispute  
10 to the Court for resolution.

11  
12 Respectfully submitted,

13  
14  
15 November 27, 2018

**EVERSHEDS SUTHERLAND (US) LLP**

/s/ Wilson G. Barmeyer

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17 *Attorneys for Defendants*  
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CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on \_\_\_\_, 2018.

/s/ Wilson G. Barmeyer

Wilson G. Barmeyer

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6 **UNITED STATES DISTRICT COURT**  
7 **SOUTHERN DISTRICT OF CALIFORNIA**  
8 **SAN DIEGO DIVISION**  
9

10 Ms. L, et al.,  
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12 Plaintiff,  
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14 v.  
15

16 U.S. Immigration and Customs  
Enforcement, et al.,  
17

18 Defendant.  
19

Case No. 3:18-cv-428-DMS

Honorable Dana M. Sabraw

**[PROPOSED] ORDER**

20 **[PROPOSED] ORDER**  
21

22 UPON CONSIDERATION of the Parties' Joint Motion Seeking Court  
23 Approval of Parties' Stipulation Related to Costs of Mailed Notice, and review of the  
24 record herein, it is it is, this \_\_\_\_\_ day of \_\_\_\_\_ 2018;

25 **ORDERED**, that Defendants agree to pay for costs to provide notice to non-  
26 detained class members for an amount up to \$16,500.00, and

27 **ORDERED**, that Plaintiffs will provide Defendants with a detailed accounting  
28



1 of all costs. If Defendants believe that Plaintiffs are improvidently using the money  
2 provided by Defendants, Defendants reserve the right to raise such concerns and any  
3 related disputes to the Court for resolution, and further,  
4

5 **ORDERED**, that if Plaintiffs determine that they need more than \$16,500.00  
6 to provide notice to non-detained class members, Plaintiffs will notify Defendants and  
7 will provide a detailed estimate of the additional amount requested, and the parties  
8 will meet and confer regarding the request and, if the parties reach agreement, present  
9 to the Court a joint proposed order to authorize the payment of further notice-related  
10 costs. Should the parties fail to resolve the matter, the parties will present the dispute  
11 to the Court for resolution.  
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14 **SO ORDERED.**  
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17 \_\_\_\_\_  
18 United States District Judge  
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